

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

INA STEINER, )  
DAVID STEINER, )  
STEINER ASSOCIATES, LLC, )  
(*Publisher of EcommerceBytes*) )  
Plaintiffs )  
 )  
Vs. )  
 )  
EBAY, INC., )  
PROGRESSIVE F.O.R.C.E.CONCEPTS, LLC )  
DEVIN WENIG, )  
STEVE WYMER, )  
JAMES BAUGH, )  
DAVID HARVILLE, )  
BRIAN GILBERT, )  
STEPHANIE POPP, )  
STEPHANIE STOCKWELL, )  
VERONICA ZEA, )  
PHILIP COOKE, )  
JOHN AND JANE DOE, )  
 )  
Defendants )

**ASSENTED TO MOTION FOR *PRO HAC VICE* ADMISSION OF  
FRANK R. UBHAUS, ESQUIRE**

Pursuant to Local Rule 83.5.3, the undersigned counsel for Defendant Veronica Zea (“Defendant”) respectfully moves this Honorable Court to grant Frank R. Ubhaus, Esq. *pro hac vice* admission in the above-captioned action. The undersigned counsel for Defendant Zea submits the following in support of the instant motion:

1. The undersigned counsel is admitted to practice before this Court and appeared for Defendant Zea in the related criminal matter, Case No. 1:20-cr-10098 WGY now pending in this Court on September 10, 2020.

2. Frank R. Ubhaus, Esq. of Berliner Cohen, LLP located in San Jose, California has also been retained by Defendant Zea in connection with the above-captioned action.

3. The undersigned counsel will remain as a counsel of record for Defendant Zea in the above-captioned action and moves pursuant to Local Rule 83.5.3 for this Court to grant Frank R. Ubhaus, Esq. *pro hac vice* admission to appear for Defendant Zea.

4. Pursuant to Local Rule 83.5.3, Certification Of Frank R. Ubhaus, Esq. In Support Of Motion For *Pro Hac Vice* Admission is attached hereto as Exhibit A.

5. The undersigned counsel has informed the Plaintiff of the within motion prior to its filing and Plaintiff has assented to this motion.

WHEREFORE, on behalf of Defendant Veronica Zea, the undersigned counsel respectfully requests that this Honorable Court grant Frank R. Ubhaus, Esq. *pro hac vice* admission in the above-captioned action.

Dated: December 29, 2021

Respectfully submitted,

**VERONICA ZEA,**

By her attorney,

*/s/ Kristen Schuler Scammon*

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**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1 I, Kristen Schuler Scammon, certify that on December 29, 2021 counsel conferred by electronic mail with the office of Rosemary Curran Scapicchio, counsel for

Plaintiff regarding this Motion and the Plaintiff does not oppose this Motion.

/s/ Kristen Schuler Scammon  
Kristen Schuler Scammon, Esq.

**Certificate of Service**

I hereby certify that on this 29<sup>th</sup> day of December, 2021, this document was filed through the Court's ECF system and will therefore be sent electronically to the registered participants identified in the Notice of Electronic Filing.

/s/ Kristen Schuler Scammon  
Kristen Schuler Scammon